



October 16, 2013

Via UPS Ground

Mr. Richard Killian (3EC00)
Office of Enforcement Compliance and
Environmental Justice
U.S. Environment Protection Agency
1650 Arch Street
Philadelphia, PA 19103

RE: Response to August 29, 2013 Information Request for Super Salvage, Inc., 1711 1st Street SW, Washington, DC 20024

Dear Mr. Killian,

Compliance Plus Services, Inc. ("CPS") is submitting the enclosed response on behalf of our client, Super Salvage, Inc. ("SSI"), to Questions 4 through 28 of the August 29, 2013 Information Request from the U.S. Environmental Protection Agency ("EPA") received by SSI on September 9, 2013. CPS subsequently requested and was granted an extension in the September 12, 2013 letter by the EPA for responding to Questions 4 through 28 of the Information Request. The response to the first three questions (1-3) was previously submitted to the EPA on September 25, 2013 and the response for the remaining questions (4-28) is due October 18, 2013.

The enclosed responses restate the questions cited in the EPA Information Request in **bold** text with the responses immediately following each question in *italicized* text. In addition, responses are supported by documents provided by SSI, where referenced, and are attached as Exhibits.

Please review the enclosed responses and contact me with any questions by phone at 215.734.1414 or electronically at mlogan@cps-2comply.com.

Sincerely,

Michael D. Logan

Vice President, Environmental Services

Compliance Plus Services, Inc.

cc:

Stephen Middelthon, Super Salvage, Inc.

Robert Bullock, Super Salvage, Inc.

CERTIFICATION:

I certify under penalty of law that I have personally examined and am familiar with the information submitted and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Stephen Middlethon, President
Name and Official Title of Owner/Operator

Signature

Date Signed

Response to August 29, 2013 Information Request from U.S. Environmental Agency ("EPA") for Super Salvage, Inc.

Provided below are the responses to Questions 4 through 28 of the August 29, 2013 Information Request issued by the U.S. Environmental Protection Agency ("EPA") to Super Salvage, Inc. ("SSI"). These responses supplement the responses to Questions 1 through 3 that were previously submitted to the EPA on September 25, 2013. All responses provided below have been prepared by Compliance Plus Services, Inc. ("CPS") on behalf of SSI based on information supplied directly by Mr. Robert Bullock, CFO unless specifically referenced otherwise. Additionally, the responses pertain only to the 5 year time period from May 2008 to May 2013 as specified in the Information Request.

For the sake of clarity, the responses provided herein restate the questions cited in the aforementioned Information Request. The EPA's questions are indicated in **bold** text with the responses immediately following in *italicized* text.

Questions Pertaining to the Clean Water Act:

- 4. Does the Facility have a National Pollutant Discharge Elimination System (NPDES) Permit? If yes, please provide a copy of the permit, along with the following:
 - a. The Facility's Notice of Intent submitted under EPA's 2008 Multi-Sector General Permit,
 - b. The Facility's Stormwater Pollution Prevention Plan (SWPPP).

<u>Response</u>: The facility does not currently have an active NPDES permit. However a search of the EPA's Enforcement & Compliance History Online database indicates that an NPDES permit number #DCU000035 exists for the facility and that an EPA inspection/evaluation was conducted in February 2000. A copy of the database search results is attached as Exhibit E.

It should be noted that a containment berm, as a Best Management Practice (BMP) recommended by the US EPA during their last inspection was built in 2000. Its construction is sufficiently high enough to prevent stormwater from leaving the facility, consequently, no Stormwater Pollution Prevention Plan (SPPP) was ever implemented.

Never the less, a SPPP is currently being developed by Compliance Plus Services for the facility and SSI is in the process of filing a Notice of Intent (NOI) to apply for coverage under the EPA's Multi-sector General Permit. The NOI is also being completed by CPS.

5. Provide a description of the nature of all activities at the Facility, including industrial activities (e.g., material storage; equipment fueling, maintenance, and cleaning; cutting steel beams).

<u>Response</u>: The facility purchases scrap metal which is segregated into ferrous (cast iron, structural steel, #1 steel, #2 steel) and non-ferrous (copper, aluminum, brass, lead, stainless steel). The segregated metal is then processed as follows:

- Cast iron is mechanically broken down to sizes specified by the customer.
- Structural steel is generally hand cut using a torch into 2 or 5 foot lengths. It is also occasionally cut down using an electric powered, 800 ton Harris shear.
- #1 and #2 steel is cut by shear and compacted into specified sizes and densities.
- Non-ferrous metals are segregated further into categories of copper, aluminum, brass and lead. The material is then processed using 4 small, electric powered, alligator shears. Stainless steel and aluminum is bailed using a bailing machine.

Ferrous metals are moved around the facility using 3 diesel powered cranes which are fueled daily from onsite tanks. The hydraulic fluid and crank case oils are checked daily and added as needed. Oil is changed after 500 hours of use. The bailer is loaded using a diesel powered, bobcat which is fueled as needed from onsite tanks. It's oil is changed after 500 hours of use. Segregated containers of non-ferrous metals are moved using two propane powered, forklifts. Propane and oil are checked daily and added as needed.

The bailer, Harris shear, and alligator shears are located inside. The forklifts and bobcat are stored inside when not in use. All cranes are located outside at all times.

Metal is generally not stored at the facility other than to accumulate enough metal to complete a truck load. The facility also accepts sealed batteries for consolidation on to pallets and shipping offsite for recycling.

Trucks with incoming material enter the facility through the entrance on the northeast corner of the site (Potomac Ave and 1st Street) and are directed to the scale for weighing. Once weighed the truck is directed to 1 of 4 locations of the facility depending on the type of metal. Non-ferrous metal is unloaded manually. Ferrous metal is dumped or unloaded using a crane with a grappler. Cast iron is unloaded using a crane with a magnet. The empty truck is then reweighed and the weight of metal removed is priced accordingly.

Outgoing material is loaded onto empty trucks that have been previously weighed, using a crane with a grappler or magnet. The filled truck is reweighed and an invoice is prepared based on the weight of metal. Truck loads are verified to be under highway weight limits and are visually inspected prior to being tarped and leaving the facility.

- 6. Provide a site map for the entire Facility, which includes, but is not limited to, the following:
 - a. The size of the property in acres;
 - b. The location and extent of significant structures and impervious surfaces;
 - c. Directions of stormwater flow (use arrows);
 - d. Locations of all existing structural control measures Best Management Practices (BMPs);

- e. Locations of all stormwater conveyances including ponds, ditches, pipes, and swales;
- f. Locations of significant spills or identified leaks that have occurred;
- g. Locations of all stormwater monitoring points;
- h. Locations of stormwater inlets and outfalls, with a unique identification code for each outfall (e.g., Outfall No. 1, No. 2, etc.), and an approximate outline of the areas draining to each outfall;
- i. Municipal separate storm sewer systems, where your stormwater discharges to them; and
- j. Locations and descriptions of all non-stormwater discharges.

<u>Response</u>: A site map for the entire facility with the requested information has been attached as Exhibit F. As noted on the site map:

- a. The size of the property is 0.95 acres
- b. The location and extent of significant structures and impervious services are clearly marked.
- c. The direction of stormwater flow is towards the depression area.
- d. The locations of the berm and stormwater retention pond, both BMPs, are clearly marked.
- e. The location of the retention pond is clearly marked.
- f. No significant spills or leaks are known.
- g. There are no stormwater monitoring points.
- h. There are no stormwater outfalls.
- i. Stormwater does not discharge to a municipal storm sewer system. The only stormwater run-off that leaves the site is from the roof drains at the south end of the site onto "S" Street SW.
- j. There are no non-stormwater discharges.
- 7. Provide all facility Stormwater self-inspection reports as well as any inspection reports generated by a third party.

<u>Response</u>: The active portion of the facility is designed to retain stormwater which is pumped to the stormwater retention pond. Visual inspections are periodically performed by facility personnel after rain events, however, there are currently no Stormwater self-inspection reports for the site. In addition, to the best of the knowledge of the facility personnel, no specific stormwater inspection reports have been generated by a third party available at the facility.

8. Provide the as-built drawings for the Facility, including post construction Best Management Practices (BMPs) and any design drawings for the discharge of the stormwater at the Facility. Include on these drawings any connections to the District of Columbia Municipal Separate Storm Sewer System (MS4), the Blue Plains wastewater treatment facility, or directly to the Anacostia River, or any other surface water.

<u>Response</u>: There are currently no as-built drawings available for the facility. Mr Bullock consulted with Joel Kaplan (employed from 1970-1998) and Paul Kaplan (employed from 1965-2005), sons of the former owner (deceased), and was unable to locate any asbuilt drawings or determine if any as-built drawings ever existed. To the best of his knowledge, Mr Bullock, is not aware of any post construction Best Management Practices or design drawings for the discharge of stormwater.

Mr Bullock also has no knowledge of any stormwater discharges connected to the DC MS4, the Blue Plains wastewater treatment facility, or Anacostia River.

9. Describe the process by which any stormwater/fluid is collected and discharged from the depression area located in the center of the Facility (i.e., whether fluid is always pumped to the stormwater pond, or sometimes removed/dispersed by some other means).

<u>Response</u>: All stormwater collected in the depression area is pumped exclusively to the stormwater pond using a manually operated pump.

- 10. With regard to the stormwater pond, a BMP, provide the following narrative responses or documentation, as appropriate:
 - a. Is the stormwater pond used for collecting any other types of liquids besides stormwater (i.e. stormwater comingled with non-process or process wastewater, oil, grease, etc.)? Identify all fluids other than stormwater that are drained or pumped into the stormwater pond.
 - b. Identify what happens to any and all liquids in the stormwater pond (i.e. groundwater recharge, direct discharge to surface water, discharge to MS4, pump-and-haul, etc.).
 - c. Where does the riser structure located in the stormwater pond discharge?
 - d. Identify any maintenance performed on the stormwater pond, including the riser located in the pond. Maintenance includes, but is not limited to, visual inspections of the pond and the riser, pumping and hauling, the addition of chemicals, skimming oil, or integrity tests of the riser. Does the Facility have maintenance logs? If so, provide logs and as many details as possible of the maintenance that took place.
 - e. Identify any sampling conducted on the contents of stormwater pond. Provide all records of the outcome of any monitoring performed in connection with the stormwater pond in the last five years, including monitoring of the liquid and the sediment in the pond.
 - f. Identify any spill minimization, prevention, and elimination activities. Include a description of the spill, including cause, and describe all BMPs used to rectify such spills. Identify any areas that were affected by such spills, including a description of any type of contamination clean-up as a result of a spill.

Response:

- a. The stormwater retention pond is not used for collecting any liquid other than stormwater. There are no process, or non-process wastewaters that comingle with the stormwater.
- b. The water in the stormwater retention pond is subject to groundwater recharge, evaporation and periodic skimming by third party contractors for offsite disposal.
- c. The location of the discharge of the stormwater pond riser structure is currently unknown. It is believed that it was installed by the previous property owner to keep stormwater from flooding this area of the facility, however, there is no evidence to substantiate this speculation. No one at SSI has ever witnessed the riser pipe take on any water.
- d. The stormwater retention pond and riser are visually inspected following significant rain events. The pond is occasionally vacuumed out and the water is disposed of by a subcontracted waste hauler. There is no addition of chemicals, or integrity testing of the riser. The facility does not keep maintenance logs for any activities associated with the pond or riser, however, service invoices for vacuuming and offsite disposal activities are provided as Exhibit H
- e. There has been no sampling of the liquid or sediment in the stormwater retention pond by SSI in the past five years, therefore, no records of monitoring or water/sediment analyses are available. However, on September 11, 2013, CPS did sample the pond water at the behest of SSI. The sample collected was sampled for total mercury. The results are attached in Exhibit I.
- f. Waste oil, motor oil, antifreeze, hydraulic fluid and used oil filters are stored in a 850 gallon secondary containment area. Details of spill prevention will be available in the Spill Prevention, Control and Countermeasure plan which is being prepared by CPS. Based on discussions with facility operators, spills at the facility have been limited to the occasional hydraulic oil spills from leaks that may develop in a shear or crane's hydraulic line. Hydraulic lines on the Harris shear in the shear house are visually inspected every 30 minutes. When a hydraulic leak does occur, operations are shutdown immediately to minimize the loss of fluid and the leak is treated with absorbent material. Leaks from the crane hydraulic lines spray over the scrap metal on the site and are unrecoverable.
- 11. Regarding the depression in the ground mentioned in paragraph 9 of this section and the stormwater pond, please respond to the following:
 - a. List all industrial materials, including hazardous materials, on-site which have the potential to come into contact with stormwater. Identify where such materials are stored, especially near the stormwater pond and the depression described in Paragraph 9 above.
 - b. What steps are taken to prevent the migration of any materials associated with industrial activities, including hazardous materials, into the depression and stormwater pond?

Response:

- a. There are two 500 gallon, double walled tanks, of off-road diesel fuel. One is located by the scale house and the other one is near the north end gate. Motor oil and antifreeze are stored in 55 gallon drums located in the containment area outside of the office at the southeast corner of the site. There are also two 275 capacity used oil tanks located in the containment area, as well as, a 500 gallon hydraulic fluid tank. There are three cranes each containing 55 gallons of hydraulic fluid. There are 4 small alligator shears each containing 10 gallons of hydraulic fluid. There are sealed car batteries containing acid that are palletized and shrink wrapped staged at the south end of the site.
- b. The used oil tanks, motor oil drums, anti-freeze drums and used oil filters are located in an 850 gallon capacity secondary containment area to prevent migration to the depression area/pond. This material is periodically removed for disposal.
- 12. Does the Facility currently use an oil/water separator as one of its BMPs? If yes, identify the location of the oil/water separator. If no, has the Facility ever used an oil/water separator? If the Facility has previously used an oil-water separator onsite, but does currently use an oil-water separator, provide the location of the oil/water separator, the date that it was taken out of service and an explanation of why it was taken out of service.

<u>Response</u>: The facility does not currently use an oil/water separator nor has the facility used an oil/water separator in the past.

13. Has the Facility ever sampled any stormwater run-off from the site?

<u>Response</u>: Stormwater run-off was sampled in the 1990's before the berm in the asphalt was installed in 2000. Since construction of the berm to contain stormwater onsite, sampling of stormwater run-off has been discontinued due to the fact that stormwater from the active portion of the facility is not intended to leave the site.

14. Identify all oil storage containers (e.g., 55 gallon drums, tanks, dumpsters, etc.) at the Facility, including the size of containers in which the oil is stored.

<u>Response</u>: The following chart documents the oil storage containers, their locations and storage capacities:

Material	Quantity	Capacity	Location
Off road diesel fuel	1	500 gallon tank	West of the shear house
Off road diesel fuel	1	500 gallon tank	Near the northeast entrance
Motor Oil	1	55gallon drum	Containment area
Anti-Freeze	1	55 gallon drum	Containment area
Used oil	2	275 gallon tank	Containment area
Hydraulic Fluid	1	3000 gallon tank	Shear house
Automatic Transmission Fluid (ATF)	multiple	Quarts bottles	Containment area
Gear Oil	multiple	5 gallon buckets	Warehouse
Gear Lubricant	5	55 gallon drum	Shear house

15. Identify all oil-filled equipment at the Facility, including the size of the oil-filled equipment storage capacity.

<u>Response</u>: The following chart documents the oil-filled equipment onsite at the facility and their storage capacities:

Equipment	Quantity	Fluid	Capacity
Cranes	3	Hydraulic Fluid	55 gal
Alligator shears	4	Hydraulic Fluid	10 gal
Bobcat	1	Hydraulic, Engine oil	20 gal, 5 qt
Forklift	2	Hydraulic, Engine oil, ATF	5gal, 5 qt, 3qt
Bailer	<i>1</i>	Hydraulic Fluid	200 gal

16. Has a Spill Prevention, Control and Countermeasure (SPCC) Plan ever been developed for the Facility? If so, provide a copy of the SPCC Plan.

Response: Prior to the EPA's multimedia inspection of the facility in May 2013, there was no SPCC plan developed for, or in place at, the facility. However, a plan is being developed by CPS. In the course of development of the SPCC plan an evaluation will be performed to assess the soil conditions, geography and location of the facility relative to nearby navigable waters to determine the applicability of such a plan at the SSI facility. Management practice has been to stop operations when a leak is discovered, stop the source of the leak, and clean up any accumulated oil with oil dry which is put in the drums with the used oil filters for offsite disposal.

17. Provide a log book or other documentation that identifies how much oil is stored in the two above ground oil storage tanks that were at the Facility at the time of the EPA inspection in May 2013.

<u>Response</u>: There is currently no log book that identifies the volume of used oil stored in the above ground tanks. Each tank has a maximum capacity of 275 gallons and the contents are periodically removed for offsite recycling.

Questions Pertaining to the Resource Conservation and Recovery Act:

18. Identify whether the Facility has ever provided dumpsters to specific entities (e.g., small business, government organizations), or to the general public, for the purpose of collecting scrap. For each event, describe what types of scrap were accepted in the dumpsters (i.e., air conditioners, electronics, light ballast, car batteries, car parts, tanks, etc.).

<u>Response</u>: Roll-off services are provided to select contractors only. Since the installation of the current tracking software in July 2012, up to 300 different contractors have been provided 754 boxes. Records of invoices by contractor are on file but not by event. The material collected ranges from light iron to structural steel. SSI does not accept air

conditioners, electronics, light ballast, car batteries, car parts, or tanks in its roll-off container service.

19. Describe the sites owned by Super Salvage that are located in Prince Frederick, Maryland and California, Maryland. Describe the relationship of these two sites to the Super Salvage site in Washington DC. What is the operational relationship between these three facilities (i.e., do they ship materials to each other)?

<u>Response:</u> The Prince Frederick, MD facility includes a large warehouse located on a 6-acre property that is owned by SSI. The California, MD facility includes a small warehouse, an office and a shed located on a 6-acre property that is leased from St Mary Scrap Holdings, LLC by SSI.

Insulated copper wire and aluminum cans are transported to the Prince Frederick facility for processing by equipment that is not currently available at the DC location. Insulated aluminum wire is transported to the California facility for the same reason. The Prince Frederick facility transports #2 mixed steel to DC for processing by the 800 ton Harris shear.

Occasionally material from a combination of two or all three facilities may be combined to complete a truckload of non-ferrous material as requested by customers. The material is placed in large containers called gaylords which are individually weighed at their respective facility before being combined onto a single box trailer for deliver to the customer.

- 20. Provide the following regarding the Blast Booth located at the Facility:
 - a. A detailed process description for the Blast Booth.
 - b. Is this Blast Booth still operational? If not, when was it last operated?
 - c. How is/was waste generated from the Blast Booth disposed of?
 - d. Has the waste generated by the Blast Booth been tested to determine whether it is a regulated waste under RCRA? If so, please provide copies of the results of any tests that were performed on the waste.
 - e. What are the Facility's plans for disposing of any remaining waste?

<u>Response</u>:

- a. The Blast Booth was used to remove paint from copper pipe (called #2 copper). The process consisted of tumbling short pieces of pipe while subjected them to air propelled stainless steel shot. The dust and residual paint was collected by the exhaust system and gravity fed into the dust collection drum. The copper recovered from the machine (now called #1 copper) was historically worth more than the original painted #2 copper.
- b. The Blast Booth is no longer operational. The operational cost of the machine exceeded the additional value of the #1 copper produced by the process. It was in service and used periodically from April 2007 through mid-2011.

- c. The waste currently present in the collection drum is estimated to be less than 100 lbs and is the total material collected during the entire service life of the machine. It has never been disposed of.
- d. Prior to the inspection by the EPA in May 2013 the waste has never been tested to determine its waste classification, therefore no records of analyses are available.
- e. The waste will be analyzed and disposed of in accordance with applicable Federal, State and local regulations.
- 21. Has the Facility made a determination of its status for the generation of waste e.g. small or large quantity generator or conditionally exempt small quantity generator? If so, provide all documents and test results relied upon to make that determination.

<u>Response</u>: SSI is registered as a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste under the District Department of the Environment (DDOE), Hazardous Waste Program guidelines. This was based on the facility's knowledge of its waste and waste generation practices. SSI, produces less than 220 pounds of hazardous waste in a calendar month and accumulates onsite less than 2200 pounds of hazardous waste at any one time prior to disposal. Annual Self-Certification of Compliance forms completed for the DDOE are attached as Exhibit J.

- 22. Identify the following regarding oil/used oil/waste oil at the Facility:
 - a. What constitutes oil/used oil/waste oil at the Facility?
 - b. What equipment or processes generate oil/used oil/waste oil?
 - c. How is oil/used oil/waste oil move around in the Facility?
 - d. How does the Facility dispose of the oil/used oil/waste oil?

Response:

- a. Virgin oil is purchased to be used in the facility equipment. The oil is then considered used/waste oil when it is removed from a machine during servicing/maintenance.
- b. The following equipment generate used oil/waste oil: two Liebherr cranes, a Fuchs crane, a Bobcat, and two Forklifts.
- c. New oil is removed from 55 gallon drums into 1 gallon containers to be added to each machine. Used oil is drained from the machines using a container specially designed for the machines' crank cases and then poured into the waste oil tank.
- d. The waste oil is removed by various used oil recyclers who pump out the waste oil tanks onto a tanker truck and take it offsite for recycling.
- 23. For all waste leaving the Facility, provide all records that support waste determinations (i.e., whether the waste is a regulated hazardous waste), including inventories, manifests, bills of lading, and any other documentation of receipts describing the waste.

<u>Response</u>: As a CESQG as defined under 40 CFR 261.5, the facility is not subject to any specific record keeping requirements and no records for waste determination could be

located. There are, however, receipts available from disposal vendors for the used oil and used oil filters, as well as, stormwater retention pond skimming. These documents are being provided as $Exhibit\ K$

24. Has the Facility ever made a Waste Determination regarding other types of waste products (i.e., aerosol cans, drums with waste stored in them, paint cans, gas cylinders, etc.)?

<u>Response</u>: The facility does not generate any regulated hazardous wastes other than waste oil. Gas cylinders are returned, refilled or exchanged when empty and are not disposed of as waste. Waste aerosol and paint cans are not generated in quantities that are reportable as defined by the CESQG guidelines.

25. Has the Facility ever removed any oil-contaminated soil from the site? If yes, provide records that describe the date, amount of soil removed, and any relevant sample lab analysis.

<u>Response</u>: The facility has no records or knowledge of any oil-contaminated soil being removed from the site.

Questions Pertaining to the Clean Air Act (CAA):

26. Does the Facility engage in any burning activities on-site? If so, provide a specific description of the burning activity that occurs, and explain what steps are taken to control/minimize the emissions from the burning activity.

<u>Response</u>: The facility utilizes two 55 gallon steel drums to burn the wood from broken pallets. Pallets are obtained from a neighboring building supply. The facility also uses propane torches to cut metal by permit from DC. There are no emission controls in place for either activity.

Questions Pertaining to the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA):

27. Have any hazardous substances, as that term is defined in Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), ever been disposed of in the stormwater pond?

<u>Response</u>: Other than periodic spills or discharges of oil petroleum substances as referenced elsewher in this response, no hazardous substances defined by the regulations noted above are known to have ever been deliberately or accidentally disposed of in the stormwater retention pond. The sole purpose of the stormwater retention pond is for the collection of stormwater.

28. Has there ever been a release of a hazardous substance anywhere else at the Facility?

<u>Response</u>: Other than periodic releases of petroleum products as referenced elsewhere in this response, there is no knowledge of any reportable release of a hazardous substance at the facility.

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Exhibit E

EPA Database Search Results

http://iaspub.epa.gov/enviro/ICIS_DETAIL_REPORTS_NPDESID.icis_tst?

np 000038 npvalue=1&npvalue=13&npvalue=14&npvalue=3&npvalue=4&npvalue=5&npvalue=6&rvalue=13&npvalue=2&npvalue=7&npvalue=7&npvalue=11&npvalue=12

Envirofacts

Search Results



ICIS Detailed Reports



This page was created on SEP-09-2013
Results are based on data extracted on AUG-15-2013

Note: You are viewing results from the modernized data system, Integrated Compliance Information System (ICIS). The state reporting this data to EPA previously reported the data to a historic data system, Permit Compliance System (PCS). Use the following button to view the historic data from PCS. [Run a PCS Search]

PCS-ICIS Links

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- Customized Search User Guide
- Operator Definition
- PCS Model
- ICIS Model
- · Law
- Contact Us
- Office of Wastewater Management Home



Facility

FACILITY NAME (1)	SUPER SALVAGE, INC.	NPDES	DCU000035
STREET 1	1711 1ST STREET SW	SIC CODE	5093 = Scrap And Waste Materials
CITY CERT	WASHINGTON	MAJOR / MINOR	
COUNTY NAME	District of Columbia	TYPE OF OWNERSHIP	Privately Owned Facility
STATE	DC	ACTIVITY STATUS	
ZIP CODE	20024	NACTIVE DATE	
REGION	Region 3	TYPE OF PERMIT ISSUED	Unpermitted Facility
LATITUDE	38,869345	ORIGINAL PERMIT ISSUE DATE	
LONGITUDE	-77,012171	PERMIT ISSUED DATE	ramanan kantan kanta
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RECEIVING WATERS		FEDERAL GRANT IND	
PRETREATMENT CODE		SLUDGE CLASS FAC IND	
MAILING NAME	SUPER SALVAGE, INC.	SLUDGE RELATED PERMIT NUM	
MAILING STREET (1)	1711 FIRST STREET, SW	ANNUAL DRY SLUDGE PROD	
MAILING STREET (2)	ATTN: JOEL KAPLAN, PRESIDENT		
MAILING CITY	WASHINGTON		
MAILING STATE	District Of Columbia		
MAILING ZIP CODE	20024		**************************************
COGNIZANT OFFICIAL		COGNIZANT OFFICIAL TEL	

Activity

FACILITY NAME (1	SUPER SALVAGE, INC.	NPDES	DCU000035	
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ACTIVITY NAME	ACTIVITY TYPE DESCRIPTION	ACTIVITY STATUS DESCRIPTION	ACTIVITY STATUS DATE	ACTUAL BEGIN DATE	ACTUAL END DATE
NPDES Permit (CWA)	Permit				
2013 Washington, DC NPDES Stormwater Inspections	Inspection/Evaluation	Achieved	25-MAR-2013	20-FE8-2013	20-FEB-2013
SUPER SALVAGE, INC. (Permit DCU000035) Stormwater	Inspection/Evaluation		25-JUL-2001		25-JUL-2001
SUPER SALVAGE, INC. (Permit DCU000035) Administrative Order	Administrative - Formal	Closed	01-AUG-2000	09-JUN-2006	01-AUG-2000
For the state of t	Inspection/Evaluation		02-FEB-2000		02-FEB-2000

W.						
SUPER SALVAGE, INC. (Permit DCU000035)		£.	¥.	É. i	t .	4
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Contacts

	SALVAGE, INC. NPDES DCU000035

No Contacts Found.

Permit Tracking

FACILITY NAME (1)	SUPER SALVAGE, INC.	NPDES	DCU000035
PERMIT ISSUED BY		ORIGINAL DATE OF ISSUE	
PERMIT ISSUED DATE		PERMIT EXPIRED DATE	
EFFECTIVE DATE		RETIREMENT DATE	

No ICIS Permit Tracking Events Found.

Inspections

FACILITY NAME (1) SUPER SALVAGE, INC. NPDES DCU000035	

			Assessment of the second of th	
	INSPECTION TYPE	DATE OF INSPECTION	INSPECTION PERFORMED BY	
-	2013 Washington, DC NPDES Stormwater Inspections	25-MAR-2013	U.S. EPA	
	SUPER SALVAGE, INC. (Permit DCU000035) Stormwater	25-JUL-2001	U.S. EPA	
-	SUPER SALVAGE, INC. (Permit DCU000035) Stormwater	02-FEB-2000	U.S./EPA	

Outfalls/Pipe Schedules

FACILITY NAME (1)	SUPER SALVAGE, INC.	NPDES	DCU000035
OUTFALL TYPE		PIPE NUMBER	
ACTIVITY STATUS		REPORT DESIGNATOR	
LATITUDE	and the second second second	LONGITUDE	***************************************
LAT/LON ACCURACY		LAT/LON METHOD	
LAT/LON SCALE		LAT/LON DATUM	William Competition Competition
NACTIVE DATE		USGS HYDRO BASIN CODE	
NIT DMR DUE DATE		SUBMISSION UNITS	
PIPE DESCRIPTION		UNITS IN SUBM. PERIOD	
INIT REPORTING DATE		REPORTING UNITS	and the second second
UNITS IN REPORTING PERIOD		DMR COMMENT	Andrew Control of the

Limits Report

FACILITY NAME (1)	SUPER SALVAGE, INC.	NPDES	DCU000035
PIPE NUMBER			
PIPE DESCRIPTION		REPORT DESIGNATOR	
DMR COMMENT		LIMIT SET TYPE	A SERVICE CONTRACTOR OF THE PROPERTY OF THE PR

No ICIS Limits Report Found.

Measurements and Violations

givenes a survivo de la companya de	-	manimistra englisis socionismos	granica de la companya del companya de la companya del companya de la companya de
FACILITY NAME (1)	SLIBED SALVAGE	INC NPDES	DOLLODOODE
	OULTIV OVENVOL	HAC.	DC0000035

No ICIS Measurements Information Found.

Compliance Schedules and Violations

44.14.14.14.44.44.44.11.44.44.44.44.44.4	<u> Dela la arreda de la Seguera de Caracteria de la composición del composición de la composición de la composición del composición del composición de la composición del composición del composición del composición del composición del composición del composición del</u>	district the control of the second
EACH ITY NAME /4	SUPER SALVAGE, INC	NDDEC
LOCKLING TO THE	SUPER SALVAGE, INC	DCU000035
		100000000

	Pretreatment Inspections/Audits
	FACILITY NAME (1) SUPER SALVAGE, INC. NPDES DCU000035
Iment Inspections Found.	
	Pretreatment Performance Summary
	FACILITY NAME (1) SUPER SALVAGE, INC. NPDES DCU000035

Note: You are viewing results from the modernized data system, Integrated Compliance Information System (ICIS). The state reporting this data to EPA previously reported the data to a historic data system, Permit Compliance System (PCS). Use the following button to view the historic data from PCS. [Run a PCS Search]

Last updated on Monday, September 09, 2013

Exhibit F

Site Map

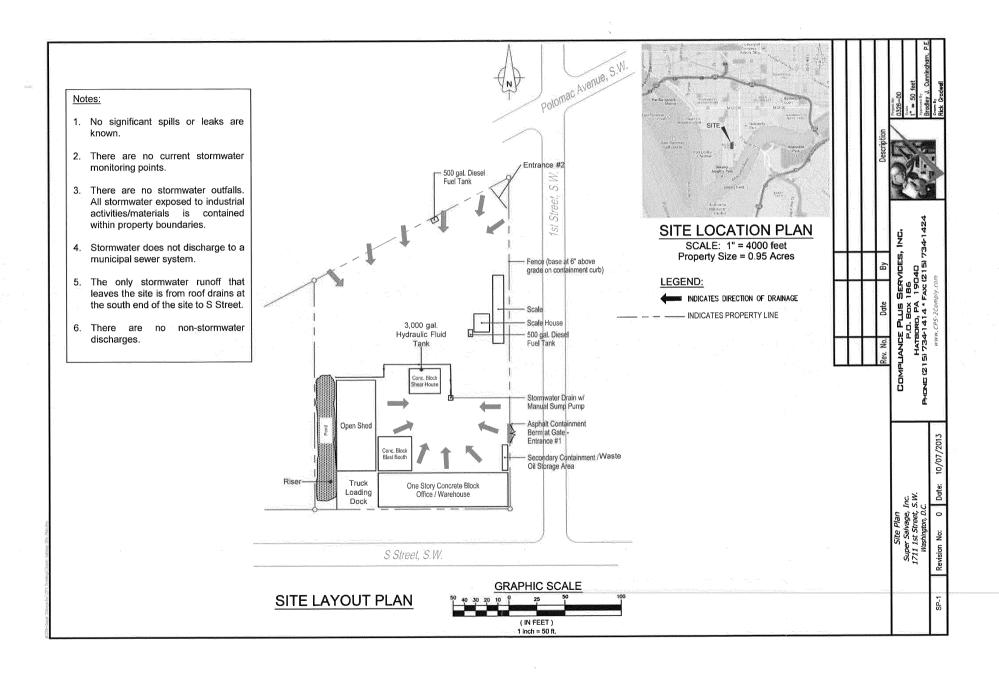


Exhibit G

Service Invoices for Vacuuming and Offsite Disposal Activities

9/12/13 2903260051

(301) 937-8611 MIS -1-800-336-8611 SEX LINK

Fax # 937-9028 FID 52-1340142



5005 Powder Mill Road P.O. Box 1467 Beltsville, MD 20704-1467

Super Salvage

1711 First Street SW Washington DC 20024

Attn:

Mike

Phone:

202-488-7157

Your Order No. Our Order No. S/J INVOICE No.

V-001390

Dec-03-1997

SITE: 1711 1st Street SW

Washington DC

SUPERS

	Shipped Via: TCI			Salesman: SWW	F.O.B.
DATE	DESCRIPTION	UNIT	W.	UNIT RATE	TOTAL
26-Nov	Liquid Disposal of Product	gal	1800	\$0.50	\$900.00
	Vacuum Pumping Services	hour	4	\$75.00	\$300.00
	\$.				
4					
	TOTAL INVOICE				\$1200.0

Payment Terms Net 30 Days

Exhibit H

Pond Water Sample Results for Mercury Sampled on September 11, 2013



September 20, 2013

BRAD CUNNINGHAM
COMPLIANCE PLUS SERVICES INC
P O BOX 186
Hatboro, PA 19040

Purchase Order;

Client ID:

SUPER SALVAGE #326

Work Order:

1017478

Dear BRAD CUNNINGHAM

Enclosed are the analytical results for sample(s) received by the laboratory on Friday, September 13, 2013. The signature below certifies that the results are based on the referenced methods and applicable certifications or accreditations are noted for each parameter reported (see key at end of report):

Unless otherwise specified all analyses of solid materials are based on dry weight.

Reported results relate only to the items tested, as received by the laboratory.

On-site analysis (analysis ASAP) is recommended for the following tests: pH, temperature, dissolved oxygen, residual chlorine and sulfite. When performed off-site, these tests do not meet NELAC standards.

Abbreviations:ug/L = micrograms per Liter, mg/L = milligrams per Liter, ug/g = micrograms per gram, mg/kg = milligrams per kilogram ug/wp = micrograms per wipe, ug/ml = micrograms per millimeter, uS/cm = microsiemens per centimeter at 25 degrees Celcius ppb = parts per billion, DF = Dilution Factor.

If you have any questions concerning this report, please feel free to call Client Services at 1-800-888-8061.

Sincere

Daw

Technical Director (or designee)

Enclosures

Report ID: 1017478-20130920164242

Page 1 of 4



ANALYTICAL RESULTS

Workorder: 1017478

SUPER SALVAGE #326

Lab ID:

1017478001

Date Received:

09/13/2013 10:55 Matrix Aqueous Liquid

Sample ID:

STORMWATER POND

Date Collected:

09/11/2013 0:00 Sample Type: NA

Parameters

Results Units

Report Limi DF Prepared

By Analyzed

Ву

Qual Certifications

Analytical Method:

EPA 245.2

Mercury

0.000670

mg/L

0.0002 1

NA

NA

9/17/2013 16:34 DMG

V

Report ID: 1017478-20130920164242

Page 2 of 4



ANALYTICAL RESULTS

Workorder: 1017478

SUPER SALVAGE #326

Lab ID:

1017478002

Date Received:

09/13/2013 10:55 Matrix Aqueous Liquid

Sample ID:

BLAST SHED DUST COLLECTOR

Date Collected:

09/11/2013 0:00 Sample Type: NA

Parameters

Results Units

Prepared

Ву Analyzed Ву

Qual Certifications

Analytical Method:

SW-846 6010B TCLP

Preparation Method: SW-846 3005A

mg/L 0.500 mg/L 0.500

Report Limi DF

1

09/19/2013 09/19/2013 08:16 08:16

JRM 9/20/2013 JRM 9/20/2013

11:11 BJS 11:11 BJS

Chromium 2.95 Lead 8.68

Report ID: 1017478-20130920164242

CERTIFICATE OF ANALYSIS

This report shall not be reproduced, except in full, without the written consent of Analytics Corporation

Page 3 of 4



ANALYTICAL RESULTS

Workorder: 1017478

SUPER SALVAGE #326

Qualifiers

Certification Index:

V = Virginia (NELAC) - 1 VAC 30-46 H 1, Laboratory ID: 460160, Certificate #: 2104

Report ID: 1017478-20130920164242

Page 4 of 4

CERTIFICATE OF ANALYSIS

LABORATORY TEST REQUEST

ACCOUNT NUMBER, NAME AND ADDRESS

COMPLIANCE PLUS SERVICES INC

P 0 B0X 186

HATBORO, PA 19040-0186

Phone: 215-734-1414 Fax: 1-215-734-1424 PROJ#: 37401065



10329 Stony Run Lane Ashland, VA 23005 (804) 365-3000 TOLL FREE (800) 888-8061 FAX (804) 365-3002

DATE SHIPPED 9-12-/3 PURCHASE ORDER NO		SAMPLE TYPE/MEDIA SOUD LIGUID CONTACT	SUPH	ME OR NUMBER 1. SALVAGE #326 ELEPHONE NUMBER
VKRBAL-V	HASELINE !	frand Cumun	2GHAM 2	15 734 1414
TURN AR SAMEDAY TO DAY CALL FOR AVAILABIL	OUND TIME SPI	ECIAL INSTRUCTIONS AND A FOUND SAMPLE HODINOWAL	OR UNUSUAL CONDITION	NS: D FAX RESULTS FAX NUMBER:
FOR LABORATORY USE ON	LY SAMPLE # OR SAMPLE ARE/	SAMPLE DATE	SAMPLE VOLUME/LITERS	ANALYSIS REQUESTED PLEASE USE SEPARATE LABORATORY TEST REQUEST FOR EACH SAMPLE TYPE
	STORM WARKER	9-11-13	500 mL	ROPA INGTHIS BED TOTAL MERCURY
	BLAST SHED DUST COLLECTOR	9-11-13	3-40Z GLASS	TELP EXTRACTION AND LEAD CHROMIUM AND LEAD
-2007				
		PRESERV	ATTIVES A	ak Pakslay 14 THE
	77	L THE		SHED BOTTLES ARE
	4	em BIHLD		
	CHAIN (OF CU	STOD)	Y RECORD
DELIVERED TO LAS				SIGN HERE TO INITIATE CHAN OF CUSTODY 9-112-131
CARRIER DATE/TIME	CONDITION OF SAMI	ANALYTICS COURIER®S	IGN HERE AMPLES RECEIVED B	DATE SAMPLES PELEASED DV
9-12-13	4°C	SIGNATUI	RE(SAMPLE RECEIVIN	G) SIGNATURE(SAMPLE RECEIVING)
47371055	ok Z		TELEGRAMPLE NOMINIS	
			MES AL	
		SIGNATUR	(E(LAB)	SIGNATURE(LAB)

Sample Container Receipt Form

Work Order:

1017478

Customer Name: COMPLIANCE PLUS SERVICES 37401065 3740106

MWATER PO	CLIENT SAMPLE IN LAB CONTAINEN ID TITLE OF	TYPE OF CONTAINER	<u>F</u>	Temp(C)	¥	Chlorine on Arrival (ppm)	Chlorine on Condition Code Arrival (ppm)	Preservative
	STORMWATER PO 1017478001-A	500P	-	7	9		XO	7000
SHED DUST	BLAST SHED DUST 1017478002-B	40ZG	-	4			OK	108
SHED DUST	BLAST SHED DUST 1017478002-C	4 0Z G	-	4			OK	7000
SHED DUST	BLAST SHED DUST 1017478002-A	4 OZ G	1	4			×	7000
Sample Custodian Signature	ignature						Date.	
			**************************************		\ 3			Version 11-13-2011 CML

Page 1 of 1

Exhibit I

Annual Self-Certification of Compliance Forms Completed for the DDOE 10/03/2013 11:56

2024881097

PAGE 01/30

Environmental Services Administration

GOVERNMENT OF THE DISTRICT OF COLUMBIA

District Department of the Environment

Toxic Substances Division

MEMORANDUM

TO:

(Freedom oblipformatus Act, Victoria North, FOIA Officer

FROM:

J. Milson

DATE:

9/26/2013

FOIA REQUEST # 130963

DATED: 9/25/2013

REC'D: 9/26/2013

A review of the Hazardous Materials Branch (HMB) records revealed the following information regarding the requested property or properties:

Requested Site Address	File Y/N	EPA ID #	RCRA/HWMR Violation Y /N	Violation(s) Corrected Y / N
1711 1 ST STREET, SW	Υ	DCR000000208	N/A	N/A
			PARTY SECTION OF THE	
		A COMPANY OF THE PARTY OF THE P		and the second and the second second
		400 May 1 to 1 4 10 May 1 (10 May 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	***	
and the second s				

HWMR = District of Columbia Hazardous Waste Management Regulations

RCRA = Resources Conservation and Recovery Act

Y = Indicates that this office does have a file

N = Indicates that a file does not exist

Notes:

Due to the voluminous nature of these files, this office requests that an appointment be schedu	led t
review them.	14

	4.		-7.
	The LIMBY DO	at responsible for the Toxic Substance Control Act (TSCA) if inf	hemation is related t
ISTRIC	7	green forward	Ozmanon is related t

DISTRICT CONTROL OF THE PROPERTY OF THE PROPER OF THE ENVIRONMENT

1200 First St. NE, 5th Floor, Washington, DC 20002 | tel: 202.535.2600 | web:ddoe.dc.gov





DUE DATE: MARCH 1, 2013

Government of the District of Columbia District Department of the Environment

DCR000000208 CEG

PAID

1200 1st Street NE, 5TH Floor, Washington, DC 20002 Phone 202-535-2290 Fax 202-635-1383

SENT SUPER SALVAGE INC 1711 FIRST STREET SW WASHINGTON DC 20024

QTY	DESCRIPTION	UNIT PRICE	LINE TOTAL
1	HAZARDOUS WASTE GENERATOR FEE	200	200
		TOTAL	200

If payment is not received <u>Friday March 01, 2013</u>, a late fee of 10% of the amount due will be added for each 30 day period or a fraction thereof.

MAKE CHECKS OR MONEY ORDERS PAYABLE TO: DC TREASURER.

Please write your EPA ID # on your check or money order.

Mail or deliver the check and this form to:
DDOE, Hazardous Waste Program
1200 First Street, NE, 5th Floor
Washington, DC 20002
Attn: Annual Hazardous Waste Generator Fee

Returned Check Charge: The passing of any check or draft for the payment of any sums due to any agency of the D.C. Government, which is subsequently returned for insufficient funds or because there is no account or the account has been closed, shall be subject to a \$65 fee for each occurrence.

For Office use only:

Fee Received on / by: 2/2/3 3811 Amount Paid: #200 Check or Money order #: 3221

Processed by / on: Payment tracker updated by / on: 2/26/12 18U



Annual Invoice Approved 1/4/12 Form 506 Rev. 6.1 Page 1 of 2 10/03/2013 11:56

2024881097

PAGE 03/30



Government of the District of Columbia Department of the Environment Hazardous Waste Program

Annual Self - Certification of Compliance

For Conditionally Exempt and Small Quantity Generators



Please note: Incomplete Forms will be returned to the facility A. Facility Information EPA Facility ID Number: Date Facility Street Address $H \ge A L_{h}$ Facility Phone Number Stephen middlethou President Contact Person for Facility name Title of Contact Person 202-498-7157 202-488-1097 Contact Phone Number Contact Fax Number Contact Person Email Address **B.** Compliance Information Questions CESQG 1. Generator Status for calendar year 2013: SQG 2. Have you surveyed the operational processes at your facility and made NO a determination if any of the wastes that are generated may be classified as hazardous waste, universal waste, or used oil? 3. Is the information on your Notification of Regulation Waste Activity, YE\$ NO EPA Form 8700-12, current? Are all hazardous waste accumulation containers labeled, dated and NO N/A sealed as required by DC regulations? 5. Is secondary containment provided for all waste containers holding NO N/A Hazardous Waste? 6. Are all Universal Waste containers being managed as required by DC NO N/A regulations? i.e. are they properly labeled, dated and closed? 位 YES 7. Are all containers storing Used Oil being managed as required by DC NO N/A Regulations? i.e. are they properly labeled "Used Oil", closed, and held inside secondary containment? 8. Did your facility have any spills or releases during previous calendar YES NO year that were required to be reported? 9. Are you treating hazardous waste at your facility to render it less YES NO hazardous? 10. Are you recycling, reclaiming, re-processing or distilling any hazardous YES NO waste at your facility? YES NO 11. Are you using a lamp crusher at your facility? 12. Did your facility implement any measures during the past calendar year YES to reduce the volume and/or toxicity of hazardous waste generated? If yes, describe changes & measures taken:

PAGE 04/30 **Annual Waste Generation** 13. How much Universal Waste* did this facility generate during 2012? number of lamps: number of batteries: or total lbs: * for additional information, see section III on page 3 of this document. 14. How much Hazardous Waste did this facility generate during 2012? lbs or -15. How many gallons of Used Oil did this facility generate during 2012? gallons Additional Questions: 16. Would your facility be interested in Compliance Assistance? 17. If your facility would prefer to receive this document via email next year, please provide an email address here: Small Quantity Generators Only: 18. Have you designated an Emergency Coordinator? YES NO 19. Have you posted the required emergency information? YES NO 20. Do you maintain copies of manifests at the facility for at least three years? YES NO 21. Have you trained your staff in accordance with state and federal regulations? YE\$ NO 22. Are you complying with accumulation time limits? YES NO C. Certification Statement "I attest under the pains and penalties of perjury: (i) that I have personally examined and am familiar with the information contained in this certification statement, including any and all documents accompanying this certification statement: (ii) that, based on my inquiry of those individuals responsible for obtaining the information, the information contained in this submittal is to the best of my knowledge, true, accurate, and complete; (iii) that systems to maintain compliance are in place at the facility and will be maintained for the coming year even if processes or operating procedures are changed over the course of the year; and (iv) that I am fully authorized to make this attestation on behalf of this facility. Source of Signatory Authority If a Corporation: If a Partnership: President General Partner Secretary If a Sole Proprietorship: Treasurer Vice President (if authorized by Corporate vote) Proprietor Representative of the above (if authorized by corporate vote and if responsible for overall operation of the facility) Government facilities, cite source of Signatory Authority; I am aware that there are significant penalties including, but not limited to, possible fines and imprisonment for willfully submitting false, inaccurate, or incomplete information. COSTEPHEN MODERTHON Print Name: Signature: Criminal Penalties for Making False Statements Any person convicted of making false statements shall be fined not more than \$1000, or imprisoned for not more than 180 days, or both. A person commits the offense of making false statements if that person willfully makes a false statement that is in fact material, in writing, directly or indirectly, to any instrumentality of the District of Columbia Government, under circumstances in which the statement could reasonably be expected to be relied upon as true. (D.C. Official Code § 22-2405) For Office Use Only Date Form Received: Form received by: Date RCRAinfo NRR entered:_ RCRAInfo data entry by:_ Generator Status for 2012 based on reported amounts; CESQG SQG LQG Not calculated Compliance Assistance Scheduled for:

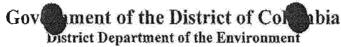
10/03/2013 11:56

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10/03/2013 11:56

2024881097

PAGE 05/30



Toxic Substances Division



Hazardous Waste Program

INVOICE

(Annual Hazardous Waste Generator Fee) (42DCMR §4390)

Dear Sir/Madam:

The Hazardous Waste Generator Fee is due on or before **March 1, 2012**. Payment may be made by cashier's check, money order, business check, personal check, or wire transfer. DO NOT send cash. DDOE-HWP cannot accept cash or credit card payments.

Please make check or money order payable to the DC Treasurer. Please write your EPA ID # on your check or money order.

Mail or hand deliver the check and this form to:

DDOE, Hazardous Waste Program 1200 First Street, NE, 5th Floor Washington, DC 20002

Attn: Annual Hazardous Waste Generator Fee

Please allow seven (7) to ten (10) days for mailing and processing of your payment. Your receipt will be your canceled check or money order copy. If you have any questions, please call (202) 535-2290 between 8:15 a.m. and 4:45 p.m.

EPA ID#	DCR000000208	
Business or site name	SUPER SALVAGE INC	
	1711 1ST STREET SW	
WASHINGTON	DC	20024
GENERATOR TYPE	AMOUNT DUE	DUE DATE
CEG	\$200	3/1/2012

If payment is not received <u>Thursday March 01, 2012</u>, a late fee of 10% of the amount due will be added for each 30 day period or a fraction thereof.

Returned Check Charge: The passing of any check or draft for the payment of any sums due to any agency of the D.C. Government, which is subsequently returned for insufficient funds or because there is no account or the account has been closed, shall be subject to a \$65 fee for each occurrence.

For Office use only: Fee Received on / by: 2.72.12	0	.0.0
Fee Received on / by: 21.	Amount Paid: 901.00	Check or Money order #: 1262
Processed by / on:	Payment tracker updated by /	on: 2 22.1/2



green forward

1200 First Street, NE, Fifth Floor, Washington, DC 20002

(202) 535-2290

Form 506 Rev. 5 Page 1 of 2



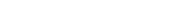
















What is my certification fee?

Fees are based on the generator status of the facility.

- Conditionally Exempt Small Quantity Generators (CESQG) pay a fee of \$200 per year on or before March 1st of each year.
 - o In order to be a CESQG, you must meet all of the following conditions:
 - Generate no more than 100 kilograms (220 lbs) per calendar month of listed and/or characteristic hazardous waste:
 - Generate no more than 1 kilogram (2.2 lbs) per calendar month of acutely hazardous waste:
 - Accumulate no more than 1000 kilograms (2,200 lbs) of listed and/or characteristic waste:
 - Accumulate no more than 1 kilograms (2.2 lbs) of acutely hazardous waste; or
 - Accumulate no more than 100 kg (220 lbs) of any residue from the cleanup of a spill of acute hazardous waste at any time.
 - Universal Waste and Used Oil weights should not included when calculating your Hazardous Waste generator status
- Small Quantity Generators (SQG) pay a fee of \$500 per year on or before March 1st of each year.
 - o In order to be a CESQG, you must meet all of the following conditions:
 - Generate more than 100 kilograms (220 lbs), but less than 1000 kilograms (2,200 lbs) per calendar month of hazardous waste;
 - Generate no more than 1 kilogram (2.2 lbs) per calendar month of acutely hazardous
 - Accumulate up to 6000 kilograms (13,200 pounds) of hazardous waste; and
 - Accumulate no more than 1 kilograms (2.2 pounds) of acutely hazardous waste
 - Universal Waste and Used Oil weights should not included when calculating your Hazardous Waste generator status
- Large Quantity Generators (LQG) pay a fee of \$1000 per year on or before March 1st of each year.

Note: If your site exceeded the criteria for SQG for any calendar month during the previous two calendar years, you must contact the Hazardous Waste Program at (202) 535-2290 immediately. If your site exceeded the criteria for SQG, your site was a Large Quantity Generator for that month. LQG are required to file a biennial report.

The fee listed on the front of this invoice is based on the generator status listed on the most recent Notification of Regulated Waste Activity, EPA form 8700-12, held by DDOE-Hazardous Waste Program. If your status has changed please contact our program at (202) 535-2290 to request a revised invoice.



VIRONMENT

